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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

U. S. DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
St. Charles Lee Thornton, Plaintiff,

Cause No: 4:07CV0079-CDP

Vs.

City of Kirkwood, Defendant.

JOINT PROPOSED SCHEDULING PLAN

Pursuant to the Court's Order dated February 22, 2007, the Plaintiff submits the Signed, Joint Proposed Scheduling Plan:

1) Track Assignment:

The parties believe that the assignment set forth in the February 22, 2007, Order (Track 2 Standard) is appropriate.

2) Joinder of Additional Parties and Amendment of Pleadings:

The parties were unable to agree on a deadline for the filing of all motions for joinder of additional parties and amendment of pleadings.

Plaintiff suggests the deadline be December 30, 2007.

Defendant suggests the deadline be April 30, 2007.

3) Discovery Plan:

a. Rule 26 Disclosures:

The Parties were unable to agree on a deadline for disclosures as required by Fed R. Civ. P. 26(a)(1).

Plaintiff suggests the deadline be August 9, 2007.

Defendant suggests the deadline be April 9, 2007.

b. Expert Witness Discovery:

The parties were unable to agree on the deadlines as required by Fed. R. Civ. P. 26(a)(2).

Plaintiff suggests the following schedule.

- I) Expert reports (by parties for the issues upon which they bear the burden of proof): August 6, 2007.
- II) Rebuttal expert reports: September 11, 2007.
- III) Deadline for taking expert depositions: October 9, 2007.

Defendant suggests the following schedule.

- I) Expert reports (by parties for the issues upon which they bear the burden of proof); June 6, 2007.
- II) Deadline for taking expert reports: July 11, 2007.
- III) Deadline for taking expert depositions: August 9, 2007.

c. Depositions and Interrogatories

The parties agree on the presumptive limits of ten (10) depositions per side. The parties disagree on amount of interrogatories.

Plaintiff believes he should be allowed 300 interrogatories.

Defendant believes they should be allowed 25 interrogatories.

d. Physical or Mental Exams:

The parties do not agree that a physical or mental examination is necessary in this case.

Plaintiff believes necessary Both Physical and Mental examinations by: October 9, 2007.

Defendant believes no Physical and Mental examinations are necessary and opposes the dates as listed above.

e. Discovery Cut-Off:

The parties agree discovery shall be completed by December 30, 2007.

4. Mediation:

The parties agree that no mediation would be appropriate in this case.

5. Motions for Summary Judgment:

The parties agree all motions for summary judgment shall be filed by January 31, 2008.

6. Trial Date:

The parties agree the case should reasonably be expected to be ready for trial by May 29, 2008.

7. Length of Trial:

The parties disagree on the length of trial.

Plaintiff believes trial will require ten (10) to twelve (12) days.

Defendant believes trial will require one (1) to two (2) days.

Respectfully submitted,

By Charles Lee Thornton
Charles Lee Thornton
351 Attucks St.
Kirkwood, Mo. 63122
Pro Se.
Date: 3-21-07

By John L. Bailes
Attorney for Defendant City of
Kirkwood ET.AL.
Date: 3/22/07